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AMAZON.COM, INC., a Delaware corporation,  
17 and AMAZON DIGITAL SERVICES, INC., a  
Delaware corporation

19 UNITED STATES DISTRICT COURT  
20 NORTHERN DISTRICT OF CALIFORNIA

22 APPLE INC., a California corporation,

23 Plaintiff,

24 v.

25 AMAZON.COM, INC., a Delaware corporation,  
and AMAZON DIGITAL SERVICES, INC., a  
26 Delaware corporation,

27 Defendants.

No. 11-cv-01327 PJH

Action Filed: March 18, 2011

STIPULATED REQUEST FOR AN  
ORDER EXTENDING DISCOVERY  
DEADLINE AND ~~PROPOSED~~ ORDER  
(Local Rule 6-2)

Pursuant to Civil Local Rule 6-2, IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that, if the Court approves, the current fact discovery deadline in the above-captioned case be extended as set forth below.

The stipulation is based on the following:

1. The parties are in the early stages of discovery.
2. Due to extensive negotiations, the parties only recently—on December 30, 2011—filed a Stipulated Protective Order governing confidential material in this case. Accordingly, no documents containing confidential material have been produced to date.
3. Because of these facts, the parties feel that fact discovery cannot be completed by the current deadline of February 15, 2012. The parties request an extension—to April 1, 2012—to complete fact discovery.
4. The parties have not previously requested any extensions to Court-ordered deadlines. The proposed change in the deadline for the close of fact discovery will not affect any other deadlines or the trial date set by the Court.
5. The current schedule and the proposed revised schedule that the parties have stipulated to are shown in the chart below.

Pre-trial Deadline	Current Schedule	Stipulated Proposed Schedule
Non-Expert Discovery Cutoff	02/15/2012	04/01/2012
Expert Disclosures	03/14/2012	03/14/2012
Expert Discovery Cutoff	05/02/2012	05/02/2012
Dispositive Motions To Be Heard By	06/13/2012	06/13/2012
Pre-Trial Conference	09/20/2012	09/20/2012
Trial Date	10/15/2012	10/15/2012

6. The parties respectfully request that the Court grant their request.

In accordance with N.D. Cal. General Order No. 45, Section X, the filer of this

document hereby attests that the concurrence to the filing of this document has been obtained from the other signatory hereto.

DATED: January 9, 2012.

DAVID R. EBERHART  
RYAN J. PADDEN  
DAVID J. SEPANIK  
O'MELVENY & MYERS LLP

By: /s/ David R. Eberhart  
DAVID R. EBERHART

Attorneys for Plaintiff  
APPLE INC.

DATED: January 9, 2012.

Respectfully,

MARTIN R. GLICK  
CLARA J. SHIN  
SARAH J. GIVAN  
ELIZABETH WANG  
ARNOLD & PORTER LLP

By: /s/ Martin R. Glick  
MARTIN R. GLICK

Attorneys for Defendants AMAZON.COM, INC., a  
Delaware corporation, and AMAZON DIGITAL  
SERVICES, INC., a Delaware corporation

**ORDER [~~PROPOSED~~]**

Pursuant to stipulation, IT IS SO ORDERED.

SIGNED on the 12th day of January, 2012.

THE HONORABLE PHYLLIS J. HAMILTON  
Judge, United States District Court  
for the Northern District of California

